

**HIGHLY QUALIFIED TEACHERS AND
IMPROVING TEACHER QUALITY STATE GRANTS (ESEA TITLE II, PART A)**

MONITORING REPORT

**South Dakota Department of Education
November 8-10, 2004**

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Overview of South Dakota:

Number of Districts: 168

Number of Teachers: 12,274

Total State Allocation (FY 2003): \$13,965,705

Allocation for local educational agencies (LEAs): \$12,759,918

State Educational Agency (SEA) State Activities Allocation: \$335,787

State Agency for Higher Education (SAHE) Allocation: \$345,640 plus \$17,000 for Administration

Scope of Review:

Like all State educational agencies (SEAs), the South Dakota Department of Education (SDDE), as a condition of receiving funds under Title I, Part A and Title II, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act (NCLB), provided an assurance to the U.S. Department of Education (the Department) that it would administer these programs in accordance with all applicable statutory and regulatory requirements, including those in Title I, Part A that concern “Highly Qualified Teachers” and those that govern the use of Title II, Part A funds. See §9304(a)(1) of the ESEA. One of the specific requirements the Department established for an SEA’s receipt of program funds under its consolidated state application (§9302(b)) was submission to the Department of annual data on how well the State has been meeting its performance target for Performance Indicator 3.1: “The percentage of classes being taught by ‘highly qualified’ teachers (as the term is defined in

§9101(23) of the ESEA), in the aggregate and in ‘high-poverty’ schools (as the term is defined in §1111(h)(1)(C)(viii) of the ESEA).’

The Department’s monitoring visit to South Dakota had two purposes. One was to review the progress of the State in meeting the ESEA’s highly qualified teacher (HQT) requirements. The second was to review the use of ESEA Title II, Part A funds by the SEA, selected districts, and the State agency for higher education (SAHE), to ensure that the funds are being used to prepare, retain, and recruit high-quality teachers and principals so that all children will achieve to a high academic achievement standards and to their full potential.

The monitoring review was conducted on November 8-10, 2004, at the offices of the SDDE. As part of the review, the Department monitoring team met with representatives of the Spearfish school district, and participated in a conference call with a representative of the Aberdeen, Wagner, and the Yankton school districts. The ED monitoring team conducted the SAHE interview with Dr. Daniel Farrington, Partnership Grants Administrator, and representatives of the grantees.

Summary of Monitoring Indicators

Monitoring Area 1: Highly Qualified Teacher Systems & Procedures			
Element Number	Description	Status	Page
Critical Element I.A.1.	Has the State developed procedures to determine whether teachers are highly qualified?	Finding	6
Critical Element I.A.2.	Does the State have data on the percentage of core academic classes that are taught by highly qualified teachers?	Met Requirements	NA
Critical Element I.A.3.	For classes taught by teachers who are not highly qualified, can the State provide estimates of classes taught by teachers in various categories (out-of-field, teachers on emergency certificates or waivers, etc.)?	Finding	6
Critical Element I.A.4.	Is there a rigorous State test that assesses elementary school teachers' subject knowledge and teaching skills?	Finding	7
Critical Element I.A.5.	Has the SEA developed procedures for determining the subject-matter competency of new middle and secondary teachers?	Met Requirements	NA
Critical Element I.A.6.	Does the State have procedures to determine whether veteran teachers are highly qualified?	Met Requirements	NA
Critical Element I.A.7.	Does the State have a plan that (a) establishes annual measurable objectives for each LEA and school and (b) includes an annual increase in the percentage of highly qualified teachers at each LEA and school?	Finding	8
Critical Element I.A.8.	Does the State have procedures to ensure that districts are hiring only highly qualified teachers for their Title I programs?	Finding	8

Monitoring Area 2: Administration of ESEA Title II, Part A			
Element Number	Description	Status	Page
Critical Element II.A.1.	Does the SEA allocate funds according to the statute, using the most recent Census data as described in the Non-Regulatory Guidance?	Met requirements	NA

Critical Element II.A.2.	Does the SEA require an application from each LEA before providing Title II funding?	Met requirements	NA
Critical Element II.A.3.	Does the SEA require each LEA to describe how the activities to be carried out are based on the required local needs assessment?	Commendations	9
Critical Element II.A.4.	Does the SEA have a procedure to determine the amount of funds each LEA expended during the appropriation period and to regularly review the drawdowns of the LEAs?	Met requirements	NA
Critical Element II.A.5.	Does the SEA have written procedures governing the amount of funds that a district may carry over and procedures governing the reallocation of funds if districts cannot use all of their allocations?	Met requirements	NA
Critical Element II.A.6.	If an LEA cannot obligate funds within the 27 months of availability (which includes the extra year of availability permitted under the Tydings amendment), does the SEA have a procedure for reallocating these carryover funds to other LEAs?	Met requirements	NA
Critical Element II.A.7.	Does the SEA ensure that it and its component LEAs are audited annually, if required, and that all corrective actions required through this process are fully implemented?	Met requirements	NA
Critical Element II.B.1.	Do LEAs conduct an annual needs assessment with the involvement of the district's teachers, including those in schools receiving assistance under the Title I, Part A program?	Met requirements	NA
Critical Element II.B.2.	Do LEAs submit an application to the SEA in order to receive their Title II funds? Was the application based on the district needs assessment, and did it describe the activities that would be carried out?	Met requirements	NA
Critical Element II.B.3.	Do LEAs use their Title II funds on authorized activities, and are such activities designed to enhance teacher quality and improve student achievement?	Met requirements	NA
Critical Element II.B.4.	Do LEAs provide timely consultation with private schools for the equitable provision of services?	Met requirements Commendation	9

Monitoring Area 3: State Activities			
Element Number	Description	Status	Page
Critical Element III.A.1.	Does the State use its State Activities funds to promote the recruitment, hiring, training, and retention of highly qualified teachers and principals?	Met requirements	NA
Critical Element III.A.2.	Does the State support activities that focus on increasing the subject-matter knowledge of teachers and that assist teachers to become highly qualified?	Met requirements	NA

Monitoring Area 4: State Agency For Higher Education (SAHE) Activities			
Element Number	Description	Status	Page
Critical Element IV.A.1.	Did the SAHE manage a competition for eligible partnerships?	Met requirements	NA
Critical Element IV.A.2.	Does the SAHE have procedures to ensure that eligible partnerships include the required members, i.e., an institution of higher education and the division of the institution that prepares teachers and principals, a school of arts and sciences, and a high-need LEA?	Met requirements Commendation	9

Area 1: State Procedures to Identify Highly Qualified Teachers

Critical Element I.A.1: Has the State developed procedures to determine whether teachers are highly qualified?

Finding: The SDDE’s procedure for determining the highly qualified teacher (HQT) status of elementary school teachers who are new to the profession is not consistent with the definition of a “highly qualified” teacher in §9101(23) of the ESEA. In particular, South Dakota does not yet have in place a rigorous State test of content knowledge (see I.A.4 for further information) that new elementary teachers can pass to demonstrate content knowledge.

Citation: The ESEA provisions governing teacher quality include basic requirements (§1119(a) and (b)) that all teachers of core academic subjects who teach in Title I programs and who were hired after the first day of the 2002-03 school year first demonstrate that they are highly qualified, and that all other teachers of core academic subjects in all public schools be highly qualified by the end of the 2005-06 school year. §9101(23) of the ESEA expressly defines a “highly qualified” teacher as one who has at least a bachelor’s degree, has full State certification, and has demonstrated competency in each subject he or she teaches in certain statutorily prescribed ways.

The ESEA HQT provisions also include important requirements in §1111(h) of the ESEA regarding public reporting to the people of South Dakota on the extent to which teachers of academic subjects in the State’s school districts are highly qualified. Together, these several ESEA requirements are a critical part of the framework Congress established in NCLB for how States accepting Title I, Part A funds would be held accountable for providing to all students – and particularly those in Title I programs – teachers with the knowledge they need to help those students not only to meet or exceed their States’ academic achievement standards, but to achieve to their full academic potential.

Further Action Required: As discussed more specifically in our determination for Critical Element I.A.4 and I.A.8 below, the SDDE must submit a written plan with specific procedures and a timeline the State will implement to ensure that determinations of whether new elementary school teachers are highly qualified conform to the definition in §9101(23) and the timeline in §1119(a)(1) and (2).

Critical Element I.A.3: For classes taught by teachers who are not highly qualified, can the State provide estimates of classes taught by teachers in various categories (e.g., out-of-field teachers, teachers on emergency certificates or waivers, etc.)?

Finding: Although this issue was not discussed during the monitoring review, the State did not provide information in an Annual State Report Card on the percentage of special education classes taught by teachers who are not highly qualified, nor did it provide information on the percentage of teachers teaching with emergency or provisional credentials.

Citation: §1111(h)(1)(C)(viii) of the ESEA requires each State to include in its Annual State Report Card information on the professional qualifications of teachers in the State, including the

percentage of classes taught by teachers who are not highly qualified (in the aggregate and disaggregated by high- and low-poverty schools) and the percentage of teachers teaching with emergency or provisional credentials.

Further Action Required: The SDDE must submit a written plan with specific procedures and a timeline for preparing and disseminating data in its Annual State Report Card on the percentage of classes taught by teachers who are not highly qualified and the percentage of teachers with emergency or provisional credentials, as required by §1111(h)(1)(C)(viii).

Critical Element I.A.4: Is there a rigorous State test that assesses elementary school teachers' subject knowledge and teaching skills?

Finding: The State has yet not implemented a rigorous test for elementary school teachers to demonstrate subject-matter competency required to be highly qualified. The State has spent the last 2 years validating the Praxis II tests for both the elementary and secondary levels. These tests will be required, beginning July 1, 2005, for all teachers new to the profession. Due to the fact that the State had no testing in place, it is requiring that all teachers new to the profession give evidence of having passed either the Collegiate Assessment of Academic Proficiency (CAAP) or a Praxis I test or having completed a portfolio approved by their preparing institution to validate their content knowledge. Currently, all public teacher-preparation institutions in the State require the CAAP assessment and all private and tribal colleges require a portfolio assessment. The State requires verification of tests from out-of-state candidates.

Citation: §9101(23)(B)(i)(II) of the ESEA permits elementary school teachers new to the profession to demonstrate subject-matter competency needed to be highly qualified only by passing a rigorous State test of subject knowledge and teaching skills in reading, writing, mathematics, and other areas of the basic elementary curriculum. §1119(a)(1) of the ESEA requires all teachers who are hired to teach in a Title I program after the first day of the 2002-03 school year to be highly qualified. §2123(a)(2)(B) of the ESEA allows districts to use ESEA Title II, Part A funds to recruit and hire highly qualified teachers to reduce class size.

Further Action Required: The SDDE must submit a written plan with specific procedures and a timeline for implementing a rigorous State test of content knowledge and teaching skills that can be used to determine the highly qualified status of elementary school teachers who are new to the profession. The SDDE must also require LEAs in the State to ensure that all elementary school teachers who are new to the profession who are hired for the 2005-06 school year to teach in a Title I program or for the purpose of class-size reduction, if paid with ESEA Title II, Part A funds, demonstrate the required subject-matter competency by passing a rigorous State test of teacher content knowledge before they can be hired for these purposes. Beginning with the 2006-07 school year, all elementary school teachers who are new to the profession, including special education teachers who provide instruction in the core academic subjects must pass the State test prior to teaching.

To ensure that only highly qualified elementary school teachers are hired in Title I programs and in Title II, Part A-funded class-size reduction, the State should require elementary school

teachers who are new to the profession to pass the currently optional State test before they are hired.

Critical Element 1.A.7: Does the State have a plan that (a) establishes annual measurable objectives for each LEA and school and (b) includes an annual increase in the percentage of highly qualified teachers at each LEA and school?

Finding: The State does not have a written plan that establishes the annual measurable objectives, and so cannot track annual district progress toward having teachers in all districts and public schools meet the highly qualified requirements by the end of the 2005-06 school year.

Citation: §1119(a)(2)(A) of the ESEA requires each SEA to develop a plan to ensure that all teachers teaching core academic subjects within the State are highly qualified by the end of the 2005-06 school year. This plan must establish annual measurable objectives for each LEA and school that includes an annual increase in the percentage of highly qualified teachers at each LEA and school and the percentage of teachers receiving high-quality professional development.

Further Action Required: The SDDE must submit a written plan with specific procedures and a timeline for implementing this requirement. The revised plan must include, among other things, annual measurable objectives for each LEA and school that includes an annual increase in the percentage of highly qualified teachers in each LEA and school and in the percentage of teachers receiving high-quality professional development.

Critical Element 1.A.8: Does the State have procedures to ensure that districts are hiring only highly qualified teachers for their Title I programs?

Finding: South Dakota's HQT procedures stipulate that all newly certified education teachers holding a valid State license are highly qualified, provided they are teaching in their assignment area. This information is verified during the Consolidated Grant Onsite Review by the SDDE's Office of Education Services and Support. However, because the State did not have a test in place that could be used as the basis for determining the HQT status of new elementary school teachers (see Critical Element 1.A.4), the SDDE cannot ensure that South Dakota school districts hired new elementary school teachers to teach in Title I programs (targeted assistance programs and schoolwide program schools), or to reduce class-size with ESEA Title II funds, who met the highly qualified teacher requirements prior to teaching.

Citation: §1119(a)(1) of the ESEA requires that all teachers hired after the first day of the 2002-03 school year to teach in Title I programs must be highly qualified.

Further Action Required: The State must submit a written plan with a specific timeline to ensure that all teachers hired from the beginning of the 2002-03 school year through the 2004-05 school year demonstrate subject-matter competency consistent with the applicable ESEA requirements. The SDDE may allow those teachers to fulfill these requirements either by passing the State content knowledge test that will soon be available for this purpose or by satisfying the requirements of its Housse procedure. As discussed in Critical Element 1.A.4, beginning with the 2005-06 school year, South Dakota must ensure that all new elementary school teachers, including special education teachers providing direct instruction in core

academic subjects, hired to teach in a Title I program demonstrate subject-matter competency by passing the State test prior to teaching. Beginning with the 2006-07 school year, this test must be used to ensure that all new elementary school teachers are highly qualified.

(Note: Similarly, teachers who have been hired with ESEA Title II, Part A funds to reduce class size are also required to be highly qualified before they are hired. The State's corrective action plan should also address how LEAs in the State will ensure that such teachers are highly qualified before they are hired to reduce class size.)

Area 2: Administration of ESEA Title II, Part A

Critical Element II.A.3: Does the SEA require each LEA to describe how the activities to be carried out are based on the required local needs assessment?

Commendation: SDDE requests that each district submit its needs assessments with the consolidated application in order to verify the alignment of a district's goals and objectives with identified needs.

Commendation: SDDE created a "Self-Assessment Instrument for LEA Consolidated Plan (Titles I, II, III, V, and VI)" for districts. This comprehensive document details questions and strategies for districts to undertake to gain a thorough understanding of their needs before they write their consolidated applications. This self-assessment also includes detailed sections on conducting a needs assessment; qualified staff; curriculum and instruction; accessibility to programs and services; private schools; Titles I, II, III, V, and VI; and Rural Economic Area Partnership (REAP) eligibility.

Critical Element II.B.4. Do LEAs provide timely consultation with private schools for the equitable provision of services?

Commendation: The State's "Self-Assessment Instrument for LEA Consolidated Plan (Titles I, II, III, V, and VI)" assists districts in providing equitable provision of services to private schools.

Area 4: State Agency For Higher Education (SAHE) Activities

Critical Element IV.3. Descriptions of SAHE-funded projects

Commendation: There is a high level of coordination between the SAHE and the SDDE to align the priorities of the Mathematics and Science Partnerships funds and the SAHE grant. The result is an integrated and effective partnership that should serve as a model to the nation.